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**COMMENTS OF THE CITY OF
GLENDALE, CALIFORNIA**

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of:)

Replacement of Part 90)
by Part 88 to Revise)
the Private Land Mobile)
Radio Services and Modify)
the Policies Governing them)

PR Docket 92-235

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To: The Commission:

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

The City of Glendale submits its comments in response to the Commission's Notice of Proposed Rule Making in these Proceedings.

INTRODUCTION:

The City of Glendale commends the Commission's for its intent to provide a significant increase in the number of channels available to land mobile services through the process of dividing existing channels into narrower segments.

The City of Glendale however is gravely concerned that the "spectrum refarming" proposals will affect the performance of our recently acquired public safety radio channels and cause the loss of investment if the City were required to replace newly acquired equipment.

Within the past two years, this City has made a large investment in a new radio system with expenditures of over 6 million dollars to purchase 50 mobile relay stations, 15 dispatch centers, 650 mobile radios, and 600 portable radios. The City of Glendale along with most other governmental agencies is experiencing a financial crises and does not have the funds available

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to replace their newly acquired system. The City of Glendale would require 15 years to amortize the equipment.

PR Docket 92-235 will not only affect the City of Glendale but will also affect many other Southern California cities which have recently replaced their radio systems. To name a few, the city of Burbank, Pasadena, Arcadia, Montebello, Beverly Hills, Culver City, Torrance, Compton, and Whittier.

PUBLIC SAFETY CONCERNS:

The City of Glendale is concerned about the following aspects of the proposal which may pose major problems for public safety.

The proposed reduction of propagations could make systems signals fall below acceptable levels.

Reduction in power could also affect mutual aid between cities and reliable communication could be impossible to achieve during major disasters.

The reduction of modulation to radio systems could decrease intelligibility between units and place the lives of safety personnel in danger.

Placing other radio channels too close to our channels could cause interference rendering our systems inoperable.

The changing of equipment to unproven technology could create unacceptable systems performance.

RECOMMENDATIONS:

The City of Glendale recommends to the Commission the following for their consideration:

1. Time for migrating to new narrow band be extended to allow for the amortization of equipment.
2. Provide wide coverage capabilities for public safety agencies during surveillance and mutual aid operations.
3. Grant existing public safety users exclusive "Use Overlay" without the need to gather concurrence from all large users channels. Present coordination of public safety channels requires all users to concur for the use of any of the channels.
4. Change loading criteria for Public Safety to be 50 mobiles per channel.
5. Combine six of the current PLMR services into one. A single coordinating group would facilitate cross coordination between these services.

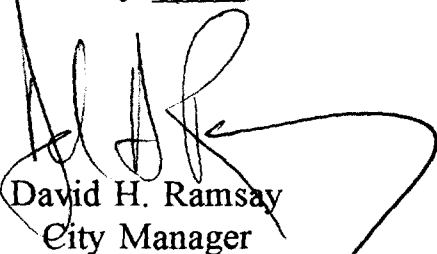
6. Provide for interference between channels under the narrow band to be comparable or less than in existing systems.
7. Grandfather exiting transmitters that cannot reduce power levels due to the generation of spurious harmonics at current power levels until the current equipment is replaced.
8. Continue the use of existing public safety coordinators for implementation of technical parameters and frequency coordination.
9. Develop separate section of the rules to apply to Public Safety only.
10. Eliminate the proposed interleaving of non-public safety services.

SUMMARY

The City of Glendale requests through our comments that the Commission's proposals PR Docket No. 92-235 take into consideration the importance of public safety communications which is ranked in priority second only to our national defense. We further request that the Commission consider the Public Safety concerns and needs in order to make the transition as smooth as possible without the cause of expensive measures.

Additionally, the City of Glendale concurs and strongly supports the comments provided the Associated Public-Safety Communications Officers Inc.(APCO), and California Public-safety Radio Association (CPRA).

Respectfully submitted,
on February 19, 1993



David H. Ramsay
City Manager

City of Glendale, California/91206